

## 13.0 SUMMARY

### 13.1 Introduction

From the various sources of information that were used to evaluate program effectiveness, three themes have emerged that frame the Permittees approach to developing the proposed 2007 DAMP. These themes are:

Demonstrating the iterative management approach: Adapting the management program to more effectively address urban sources of pollutants that are causing or contributing to exceedances of water quality standards;

Enhancing Implementation: Improving program implementation through incorporation of auditable environmental management system concepts; and,

Establishing watershed-based water quality planning: On a Countywide basis, creating two separate, but nonetheless highly inter-related, water quality planning processes to address urban sources of pollutants.

Each of these themes is the basis for two types of programmatic recommendations, specifically (1) ROWD Commitments (new programmatic commitments to be developed and implemented over the period of the Fourth Term Permits) and (2) DAMP Modifications (improvements to existing program commitments incorporated into the proposed 2007 DAMP).

### 13.2 Demonstrating Iterative Management

#### ROWD Commitments:

- Develop Model Integrated Pest Management, Pesticide and Fertilizer Guidelines into a Model Program (rather than guidelines) with implementation goals and including model contract language (see **Section 5.3.2**).
- Develop recommendations for the selection and installation of drain inlet screens (see **Section 5.3.3**).
- Develop model language for municipal trash collection and haulage contracts that address water quality protection issues (see **Section 5.3.3**).
- Develop and implement BMPs for architectural uses of copper and zinc (see **Section 7.3.1**).

### 13.3 Enhancing Implementation

#### ROWD Commitments:

- Prepare a training schedule and define expertise and competencies for
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## SECTION 13.0, SUMMARY

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- jurisdictional program manager positions (see **Section 2.3.2**).
- Prepare a fiscal reporting strategy based upon an audit of the fiscal analysis reporting section of the PEA, to better define the expenditure and budget line items included in the fiscal report (see **Section 2.3.4**).
  - Prepare metric definitions and guidance to improve efficacy of the assessment process.
  - Standardize SDR and SAR definitions of “High” priority and develop prioritization process that is better predicated on the threat (diminished by BMP implementation) posed by the facility, and consider the presence of “constituents of concern” (see **Section 5.3.1**).
  - Redefine IPM (pesticide use) indicators (see **Section 5.3.1**).
  - Prepare guidance documentation and clarify requirements or conceptual Project WQMP (see **Section 7.3.1**).
  - Prepare guidance and training as needed on the recordation process (timing and appropriate documents to use) and develop recommendations for appropriate methods to employ to enable the Permittees to enforce the approved WQMP against subsequent property owners (see **Section 7.3.1**).
  - Develop library of BMP performance reports (see **Section 7.3.1**).
  - Develop standard design checklist/plans/details for source and treatment control BMPs (see **Section 7.3.1**).
  - Develop recommendations/guidance for enhanced Model WQMP language regarding Site Design BMPs (see **Section 7.3.1**).
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  - Evaluate the NTS approval process and develop recommendations for streamlining regulatory agency approval of regional treatment control BMPs (see **Section 7.3.1**).
  - Prepare a training schedule including defined expertise and competencies for staff with WQMP review and approval responsibilities (see **Section 7.3.1**).
  - Prepare a training schedule including defined expertise and competencies for construction inspectors (see **Section 8.3.1**).
  - Develop a more detailed prioritization process to improve standardized reporting and to support re-direction of inspection resources to significant sources of priority constituents of concern (see **Section 9.3.1**).
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## SECTION 13.0, SUMMARY

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- Develop effective alternative to re-inspection such as self-certification (see **Section 9.3.1**).
- Prepare defined expertise and competencies for authorized inspector positions and develop a training schedule to meet these requirements (see **Section 9.3.1**).

### DAMP Modifications:

- Revised the DAMP for greater consistency with established Environmental Management System (EMS) principles and improved accessibility to different constituencies and levels or readership (see **Section 2.3.3**).
- Revised **DAMP Section 3.0 plan improvement process** to detail iterative process for DAMP improvement (see **Section 3.3.1**).
- Defined “fixed facilities,” “field programs,” and “drainage facility sites” (see **Section 5.3.1**).
- Eliminated Environmental Performance Reporting (EPR) program (which is duplicative of Model Municipal Activities Program) (see **Section 5.3.1**).
- Revised Model WQMP Table 7.II.6 for latest information on BMPs and clarity (see **Section 7.3.1**).
- Evaluated and revised (as necessary) prioritization provisions for Countywide consistency (see **Section 7.3.1**).
- Provided definitive construction site prioritization guidance (see **Section 8.3.1**).
- Clarified inspection frequencies; violation definitions and re-inspection (see **Section 9.3.1**).
- Provided definitive industrial and commercial facility descriptions (see **Section 9.3.1**).

### **13.4 Establishing Watershed-Based Water Quality Planning**

#### ROWD Commitment:

- Complete DAMP/Watershed Action Plans for all 11 Orange County watersheds (see **Section 12.3.2**).
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